



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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In Reply Refer To:
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EMS TRANSMISSION: 10/18/04
Instruction Memorandum No. **CA-2005-004**
Expires: 09/30/06

To: All California Managers and Supervisors

From: State Director

Subject: Policy on Occupational Safety and Health for California BLM,
and California State Safety and Health Action Plan

This memorandum updates and reissues the policy on Occupational Safety & Health for California BLM and transmits the attached California State Safety and Health Action Plan.

BLM's policy is to provide safe and healthy working conditions, prevent employee injuries and work-related illnesses, prevent visitor injuries, and protect Bureau owned or leased property from damage. All managers are responsible and accountable for implementing and managing a vigorous safety program and incorporating safety conscious work practices for all programs under their jurisdiction. BLM Handbook 1112-2, Safety and Health for Field Operations, contains information and guidance on the Safety Program. In addition, the California Strategic Priorities include an emphasis on specific aspects of our Safety Program.

I expect each of you to incorporate safety into your workforce and budget planning processes to ensure that appropriate funding, personnel, and other means are allocated to effectively administer the Safety Program. In addition, I expect each of you to establish an environment which values safety first in the decision making process.

I encourage each of you to become advocates for Occupational Safety and Health in the workplace. We all have a responsibility to prevent accidents, to identify and correct hazards, to provide a healthy work environment, and to provide and use appropriate engineering practices, administrative controls, and/or protective equipment. Please use the attached Best Management Practices, (attachment 2) in developing and managing a high quality Safety Program for your unit.

Assistance in the various aspects of the Safety Program can be obtained from your local Field Office Manager, Field Office Safety Officers or from the State Safety Manager. The Safety Officers are:

<u>Contact</u>	<u>Location</u>	<u>Phone Number</u>
Bruce MacWhinney	Bakersfield F.O.	661-391-6059
Donna McMullen	Bishop F.O.	760-872-4881
Ken Hood	Folsom F.O.	916-985-4474
Dave Slibsager	Hollister F.O.	831-630-5040
Russ Elam	Eagle Lake F.O.	530-252-5317
Dave McKirahan	Alturas F.O.	530-233-4666
Vacant	Surprise F.O.	
Hank Harrison	Arcata F.O.	707-825-2318
Dave Fatch	Clear Lake F.O.	707-468-4053
Joe Tyler	Redding F.O.	530-224-2173
Stephen Johnson	CDD	909-697-5233
Peter Graves	Ridgecrest F.O.	760-384-5400
Steve Fornelius	Palm Springs F.O.	760-251-4829
Gil Fritzsche	El Centro F.O.	760-337-4400
Bob Raver	Barstow F.O.	760-252-6048
Bill Wiley	Needles F.O.	760-326-7015
Jim Anger	Sacramento F.O.	916-978-4521

For additional information and guidance on the Safety Program, please review [BLM Handbook 1112-2](#) Safety and Health for Field Operations. Questions regarding this IM can be directed to Jim Anger at (916) 978-4521.

Signed by:
Karen Barnette
Acting State Director

Authenticated by:
Richard A. Erickson
Records Management

4Attachments:

1. California State Safety and Health Action Plan (5 pgs)
2. Best Management Practices (1 pg.)
3. Safety Training Matrix (3 pp)
4. FY 2004 Safety Statistics (3 pp) (*see separate Word file*)

BLM CALIFORNIA
Occupational Safety and Health Action Plan

Fiscal Years 2005- 2008

The BLM California Occupational Safety and Health Action Plan is established in accordance with 29 CFR 1960, Departmental Manual 485, BLM Manual 1112 and Executive Order 2000 as well as other OSHA, Departmental and Bureau requirements as appropriate.

I. ORGANIZATION AND ADMINISTRATION

A. SAFETY POLICY

- (1) State Director's Safety Policy will be issued on an annual basis.
- (2) This policy will be distributed to all employees.
- (3) Managers will promote this policy regularly at all employee meetings or other appropriate work gatherings.

B. STAFFING AND RESOURCE MANAGEMENT

- (1) Allocate an appropriate level of resources to ensure a robust safety program Statewide. This will require a reasonable commitment of time, staff and financial resources in order to achieve success.
- (2) Allow Collateral duty safety personnel adequate time to perform their safety duties. Duties including – facilities inspections, accident reporting & (when necessary investigation) training, CASHE and PMR compliance, record keeping and general program oversight.

C. SAFETY COMMITTEE

- (1) Ensure appropriate safety committees have been appointed and convene in accordance with the management labor agreement on an as needed basis.
- (2) Duties and responsibilities of the committee must be set forth in writing via a written charter.
- (3) Meetings will be held routinely at the discretion of management and committee membership. Minutes will be kept on file and distributed as necessary.
- (4) Management level officials ASD/DSD/DM/FOM will chair the respective committee(s).

D. ANNUAL SAFETY GOALS AND OBJECTIVES

- (1) Measurable annual state/district/field office work plans, goals and objectives will be developed for the Occupational Safety and Health Program for each office in California.
- Each office manager may develop their own plans independently or can adopt this state plan through transmittal to their respective employees (See 1.H.4).

(2) Objectives will be tracked and measured by the local Management and Safety Officers.

(3) The results will be reported to staff through appropriate means.

E. MANAGEMENT SAFETY PERFORMANCE EVALUATION

(1) Safety performance will be part of the State Director's performance evaluation.

(2) Safety performance will be a part of all managers and supervisors performance evaluations.

(3) Safety performance will be a part of all employees' performance evaluation.

(4) Safety will be a part of the staff and manager's developmental training

F. INTERACTION WITH OTHER PROGRAMS AND AGENCIES

(1) State & District Safety Managers and CDSO's will actively work with program managers for Fire, Law Enforcement and HAZMAT Programs. The purpose of this interaction is to aid in the identification of potential risks and hazards. 3% Accident/Incident and Injury reduction per year will be the goal and the standard of measurable success in these programs per the President's SHARE Program..

(2) The State and District Safety Managers and CDSO's will establish an effective working relationship with local OSHA or other related agencies, activities or information sources. This can be achieved through memberships with National Safety Council, Red Cross, Local Safety & Health Organizations, OSHA's Voluntary Protection Programs (VPP) or interagency information, training and developmental exchange.

G. SAFETY PROGRAM BUDGETING

(1) Safety and Protective Clothing and Equipment (PCE) will be budgeted and provided to all employees requiring PCE. A Risk Assessment will be the written means of documenting and justifying the need to purchase and use PCE.

(2) Each office in California will establish a Promotional Materials and Awards Program as required by OSHA for noteworthy safety initiatives and achievements.

(3) Safety training will be provided on a regular and recurring basis as identified in the staff & manager's performance and development documents.

(4) Monies will be identified and allocated for the correction of unsafe/unhealthful conditions. These conditions will be addressed immediately. A written hazard abatement plan will be posted detailing corrective measures for any known & identified unsafe conditions that are expected to take more than 30 days to correct.

H. SAFETY AND HEALTH PROMOTION AND AWARENESS PROGRAMS WILL BE ESTABLISHED IN EACH OFFICE.

(1) Employee Bulletin Boards will reflect current OSHA Poster as required in 29CFR Part 1960.

(2) Monthly Safety Notices and promotional information will be published by the State Safety Manager and distributed to all employees.

- (3) Accident prevention poster, notices and bulletins will be posted on the employee bulletin board and/or distributed among the staff on a monthly basis.
- (4) **A WRITTEN SAFETY PROGRAM DOCUMENT WILL BE ISSUED BY EACH OFFICE MANAGER.** (Using this plan under each manager's signature constitutes compliance with this regulatory requirement.)

II. GENERAL PROGRAM ELEMENTS

A. ACCIDENT REPORTING, INVESTIGATION, AND RECORD-KEEPING

- (1) Formal accident reporting and investigating procedures will be established and conducted by key personnel (i.e.; managers, supervisors and Safety Officers.) Safety Personnel will be trained to perform (at least) preliminary investigations.
- (2) First line Supervisors will conduct preliminary accident investigations and enter all accidents into the Safety Management Information System (SMIS). This first line supervisory responsibility will not be delegated to a subordinate supervisor, lead, safety manager or staff assistant.
- (3) Training may be offered to all supervisors on how to conduct accident investigations.
- (4) A record keeping system and analysis of accident trends will be communicated to management not less than annually and/or on an as needed basis by the State Safety Manager (See II.G.).

B. SAFETY EVALUATIONS

- (1) Safety evaluations of at least 3 offices per year of the District/Field Offices will be conducted by the State Safety Manager and the District/Field Office Safety Officer.
- (2). Follow up evaluations will be performed within 4 years of each baseline evaluation.

C. ABATEMENT

- (1) Corrective action will be initiated whenever safety deficiencies are identified.
- (2) Abatement Plans (29 CFR 1960.30) will be prepared for all outstanding safety deficiencies that cannot be corrected within 30 days. The State Safety Manager will provide information and guidance on the preparation of these plans to ensure proper format and content in accordance with prescribed regulations.

D. VISITOR SAFETY

- (1) A log of visitor accidents will be maintained at each Field Office in California. Visitor accidents will be entered in SMIS within 72 hours of discovery of occurrence.
- (2) All recordings of visitor accidents will be complete, including a comprehensive narrative that fully describes the accident. This will be achieved by the development of full and concise narratives entered into the SMIS by responsible personnel

E. RISK ASSESSMENT

(1) Risk Assessments (RA) will be developed prior to the performance of high risk, arduous, new, unusual or potentially dangerous work assignments.

(2) RA's must adequately assess hazards and detail appropriate risk alternatives, administrative controls, engineering practices or PPE and other safety related equipment, development or training and operations.

F. OSHA IMPLEMENTATION

(1) The OSHA 300 Log will be posted for each office for the calendar year as described in 29 CFR 1960.

(2) Any/all OSHA inspections will be posted. All noted deficiencies will immediately be abated or a hazard abatement plan will be written and posted to document specific time frames for remediation. All OSHA inspections will be reported to the State Safety Manager.

(3) Procedures for reporting unsafe or unhealthful working conditions will be distributed to all staff in each major office.

(4) It will be the responsibility of the State Safety Manager to develop statewide guidance, direction and policy.

G. USE OF ACCIDENT INDICATORS/TRENDS

(1) SMIS and OWCP data will be used in the planning process for annual work plans.

(2) SMIS and OWCP data will be used to determine accident trends.

(3) SMIS and OWCP trend data will be provided to management in periodic reports not less than annually or on an as needed basis by the State and District Safety Managers.

(4) Other data sources such as OSHA statistics may be used to develop or confirm accident trends.

III. MOTOR VEHICLE SAFETY

A. DEFENSIVE DRIVER TRAINING

(1) Employees who operate government vehicles as a job requirement will be provided defensive driver training every three years.

(2) Special driver training will be provided for seasonal and temporary employees, those who operate heavy equipment, and other specialized mobile equipment uses.

(3) Drivers who cause preventable, on-the-job vehicle accidents will receive remedial training within 90 days of the occurrence of the accident.

B. DISTANCE DRIVING

- (1) A Statewide distance driving policy has been established and published and is consistent with BLM Manual H-1112-2.
- (2) Managers and supervisors will be responsible for monitoring and enforcing such policy.

C. VEHICLE ACCIDENT REVIEW SYSTEM

- (1) Vehicle accidents will be reviewed to determine preventability by management officials and local Safety Officers or the State Safety Manager.

V. TRAINING

A. EMPLOYEE TRAINING

- (1) Full-time employees will be provided appropriate safety training beginning in FY2005 and continuing over a 4-year period. BLM Manual Handbook 1112-2 and the attached Safety Training Matrix, provides a detailed list of all required and optional safety training.
- (2) Seasonal employees will be provided the same or similar safety training as established and identified through Risk Assessment or as required in the safety training matrix. At a minimum, Basic Safety Training, Drivers Training, Blood borne Pathogens and HAZCOMM will be provided.
- (3) RA's can be used to identify training needs for specific activities.
- (4) **All safety training will be documented and maintained on file.**

B. SUPERVISOR TRAINING AND SAFETY MANAGEMENT

- (1) Managers and supervisors will receive safety training, as prescribed in 29 CFR 1960, EO 12196 and BLM Manual Handbook H-1112-2 (See attached Safety Training Matrix). This training will begin in FY-05 and will continue over the course of the next four years or completion of the required curriculum (whichever comes first).
- (2) Team Leaders will receive safety training at the same level as supervisors as determined by RA.
- (3) Supervisors and team leaders will be aware of and aggressively implement safety program elements as well as comply with the tenets of this State Safety and Health Action Plan.

C. COLLATERAL DUTY SAFETY OFFICERS (CDSO)

- (1) CDSO's will receive basic safety training as required by 29 CFR 1960 and the Bureau's Core Competency Training Standards
- (2) A minimum of 20% of the CDSO's time on duty will be dedicated to the Bureau's Occupational Safety and Health Program.

(3) Time and Attendance will be documented to reflect this percentage.
The project code: XO will be used to record work performed in the field of safety.

(4) CDSO's will perform a complete facilities inspection of each facility within their jurisdiction at least annually.

(5) CDSO's will serve as advisors and subject matter specialists in each of their respective Safety Committees and for their respective Field Manager.

OCCUPATIONAL SAFETY & HEALTH, “BEST PRACTICES”

- WHEREVER POSSIBLE, CONTRACT-OUT THE HIGH RISK WORK. DON'T UNNECESSARILY EXPOSE YOUR EMPLOYEES TO DANGER.
- ENCOURAGE HEALTHY LIFESTYLES. HEALTHY EMPLOYEES ARE USUALLY SAFER EMPLOYEES.
- ALWAYS ALLOW ENOUGH TIME TO GET THE JOB DONE RIGHT... INCLUDING OVERALL DRIVING TIME, PICK-UP & DELIVERIES AND RETURN COMMUTES HOME.
- SHARE GOOD IDEAS. DO YOU OR YOUR STAFF HAVE SOUND SAFETY EXPERIENCES FROM OTHER PEOPLE OR OTHER PLACES?
- MAKE SAFETY PERSONAL. PLAN AT LEAST ONE SAFETY RELATED ACTIVITY THAT YOU INITIATE & CARRY OUT EVERY YEAR.
- “MANAGE SAFELY, BY WANDERING AROUND”. TAKE THE TIME TO GET UP AND LOOK AROUND YOUR WORK SITES, WAREYARDS AND MOTOR POOLS. YOU MIGHT DISCOVER A SITUATION BEFORE IT BECOMES A PROBLEM.
- CATCH SOMEONE DOING SOMETHING SAFE! LET THEM KNOW HOW MUCH YOU PERSONALLY APPRECIATE THEIR SAFETY CONCIOUSNESS.
- JOIN THE STAFF ON SAFETY INSPECTIONS. SHOW THEM IT'S IMPORTANT ENOUGH FOR YOU TO BE THERE WITH THEM.
- ENCOURAGE “TAIL-GATE” SAFETY SESSIONS FOR FIELD PERSONNEL ON A REGULAR BASIS. LET THEM “TALK IT OUT” BEFORE THEY GO.
- ASK EMPLOYEES FOR THEIR INPUT ON SAFETY RELATED ISSUES REGULARLY. LET THEM KNOW THEIR OPINIONS MATTER.
- ENCOURAGE INTERACTION WITH YOUR STAFF AND OTHER OFFICES. IDEA SHARING COULD LEAD TO CREATIVE SOLUTIONS AND ENHANCE YOUR LOCAL SAFETY PROGRAM.
- JUST DO IT! TAKE RESPONSIBILITY FOR THE SAFETY OF YOUR WORK AREA. DON'T EXPECT “SOMEBODY ELSE” TO MAKE THE ENVIRONMENT COMPLETELY SAFE FOR YOU OR YOUR COWORKERS.

**MANDATORY SAFETY TRAINING DEPENDENT ON
RISK ASSESSMENT**

Position/Task	Authority	Frequency
Safety Training for Managers	29 CFR 1960.54	Once
Safety Training for Supervisors	29 CFR 1960.55	Once
Safety Training for Collateral Duty Safety Personnel	29 CFR 1960.58	Once within 90 days
Safety Training for Safety Specialists	29 CFR 1960.56	Yearly
Safety Orientation	BLM Manual H-1112-1 Chapter 10	Once--All employees
State Safety Committee Training	29 CFR 1960.58	Once
Haz-Com (Employee Right-to-Know)	29 CFR 1910.1200	Once--unless job change or new chemical added (all employees)
Job Hazard Analysis	485 DM Chapter 14 BLM Handbook H-1112-2 Topic 1	Once--recurrent review as Job Hazards change
Bloodborne Pathogen Level I	29 CFR 1910.1030	Once
Defensive Driving	H-1112-2 Topic 4	Every 3 yrs as required by position
Forklift Safety	29 CFR 1910.178	Once--or as determined by Risk Assessment (RA)
Respiratory Protection	29 CFR 1910.134	Once--as determined by RA
First Responder Awareness Level (HazMat)	29 CFR 1910.120(a)	Once--all employees
First Aid/CPR	BLM Manual H-1112-1 Chapter 10 26 CFR 1910.151	Every 2 years for CPR Every 3 years for First Aid--as determined by RA
Fire Extinguisher	29 CFR 1910.157	Once
Evacuation/Fire Drill	29 CFR 1910.38	Once yearly
Hearing Conservation	29 CFR 1910.95	Once--as determined by RA
Hazardous Waste Operations and Emergency Response (HAZWOPER)	29 CFR 1910.120	40 hours initial 8 hours refresher yearly-- as determined by RA
Welding	29 CFR 1910.252	Once--as determined by RA
Sign and Tag Recognition	29 CFR 1910.145	Once--as determined by RA
Lockout/Tagout	29 CFR 1910.147	Once--as determined by RA

**MANDATORY SAFETY TRAINING DEPENDENT ON
RISK ASSESSMENT**

Position/Task	Authority	Frequency
Confined Spaces	29 CFR 1926.21	Each space--as determined by RA
OSHA PPE Standard Personal Protective Measures	29 CFR 1910.132 29 CFR 1926.21	Once--as determined by RA
Power Operated Handtools	29 CFR 1926.302	Once--as determined by RA
Woodworking Tools	29 CFR 1926.304	Once--as determined by RA
Gas Welding	29 CFR 1926.350	Once--as determined by RA
Arc Welding	29 CFR 1926.354	Once--as determined by RA
Commercial Driver's License (CDL)	49 CFR 383-395	5 years--as determined by RA
<u>Fall Protection</u> -Towers -Telecommunication	29 CFR 1926.500 29 CFR 910.29 29 CFR 1910.268	As determined by RA
Blaster's Certification and Training	BLM Manual H-1112-1 Chapter 22	24 hours initial training, CDL pre-req. 8 hrs yearly refresher
Firearms Safety (Proficiency Test) Firearms Training	BLM Manual H-1112-1 Chapter 25 H-1112-2 Topic 17	Yearly-- As identified in H-1112-2 and determined by RA
ATV Operation	BLM Manual H-1112-1 Chapter 13	Once--as determined by RA
Water Craft Operation	485 DM 22 BLM Handbook H-1112-2 Topic 14	Initial training 24 hrs. Refresher 8 hrs. every 5 years--as per RA
Snowmobile Operation	BLM Manual H-1112-1 Chapter 13	Once--as determined by RA
Wildland Firefighting	BLM Manual 9215 Referencing National Wildfire Coordinating Group's PMS 310-1 Wildland Fire Qualification Subsystem Guide	As determined by position requirements
Base Fire Training	BLM Manual H-1112-1 Chapter 15	Once--as determined by RA
Aviation Safety Training	352-DM-2.5 BLM Handbook H-1112-2 Topic 6	Group A--Initial and recurrent every 3 years Group B--Optional--Passenger briefing required each flight
Mine Inspection Safety Procedures	BLM Manual 3809.36	As determined by RA
Oil and Gas Inspection Safety Procedures	BLM Manual 3110	As determined by RA

**MANDATORY SAFETY TRAINING DEPENDENT ON
RISK ASSESSMENT**

Position/Task	Authority	Frequency
Anhydrous Ammonia	29 CFR 1910.111	As determined by RA
Asbestos	29 CFR 1910.1001	As determined by RA
Lead	29 CFR 1910.1025	As determined by RA
Winch Operation	Optional	As determined by RA
Chain Saw Certification	Optional	As determined by RA
Hazard Tree Evaluation	Optional	As determined by RA
Safe Lifting Techniques	Optional	As determined by RA
Arctic-Subarctic Survival	Optional	As determined by RA
Swift water Rescue	Optional	As determined by RA
Emergency Trauma Training (ETT)	Optional	As determined by RA
Emergency Medical Training (EMT)	Optional	As determined by RA
Wilderness Trauma Care	Optional	As determined by RA
Submerged Aircraft Rescue	Optional	As determined by RA
Dangerous Animal Encounters	Optional	As determined by RA
Ergonomics	Optional	As determined by RA
Horse Safety	Optional	As determined by RA
Desert Survival	Optional	As determined by RA
Submerged Aircraft Rescue	Optional	As determined by RA
Epinephrine (Bee Stings)	Optional	As determined by RA
Submerged Aircraft Rescue	Optional	As determined by RA